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December 17, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Nina R. Morrison, U.S.D.J.
225 Cadman Plaza East
Courtroom 6E North
Brooklyn, NY 11201-1804

Re: Rodriguez, et ano v. Crown Heights Pizza, LLC, et al.
Case No.: 1:24-cv-2848 (NRM) (RML)

Dear Judge Morrison:

This firm is represents the Defendants in this case. Defendants respectfully submit this letter to request an adjournment of the pre-motion conference currently scheduled to proceed on Thursday, December 19, 2024 at 2:30 PM.

Pursuant to ¶ 1.7 of this Court's Individual Practice Rules, Defendants respectfully submit that:

(i) the reason for the request is because your undersigned is currently out of the country through Tuesday, December 24, 2024;

(ii) the original date of the conference is set forth above;

(iii-iv) there have been no previous requests for an adjournment of this pre-motion conference; and

(v-vi) Plaintiffs have not responded to Defendants' request for consent and thus Defendants have been unable to meet-and-confer such that alternative dates may be proposed.

For the foregoing reasons, Defendants respectfully submits that there exists sufficient good cause for an extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York
December 17, 2024

Respectfully submitted,

SAGE LEGAL LLC

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